

Pursuant to the Freedom of Information Act, 5 U.S.C. § 522 (“FOIA”), we respectfully request the following documents and information:

The following terms shall be defined herein:

- i. “2010 SO₂ NAAQS” shall refer to the 2010 1-Hour Sulfur Dioxide Primary National Ambient Air Quality Standard, 75 Fed. Reg. 35,520 (June 22, 2010).
- ii. “Document” shall mean the following (whether in hard copy or electronic form): phone logs; notes; correspondence; communications of any nature; memoranda; summaries or records of personal conversations; reports; publications; minutes and records of meetings; transcripts of oral testimony and statements; summaries and reports of interviews, negotiations, investigations, and studies; agreements and contracts, including all modifications and revisions thereof; audio and video recordings; photographs; records; electronically stored information; electronic mail transmissions; and facsimile transmissions;
 - a. “Document” shall include all non-identical copies of a document, such as copies of documents with handwritten notations on them;
 - b. “Document” shall exclude any documents generated or prepared by Southern Illinois Power Cooperative or its consultant, AECOM.
- iii. “EPA” shall refer to the United States Environmental Protection Agency Region 5, and any employees or agents thereof.
- iv. “IEPA” shall refer to the Illinois Environmental Protection Agency and any employees or agents thereof.

Subject to the definitions above, in accordance with FOIA, we specifically request the following records:

- 1. From September 2015 to present, all communications with Sierra Club regarding the designation or proposed designation of Williamson County, IL under the 2010 SO₂ NAAQS.
- 2. From September 2015 to present, all documents, including modeling files, submitted by Sierra Club regarding the designation or proposed designation of Williamson County, IL under the 2010 SO₂ NAAQS.
- 3. From September 2015 to present, all documents and communications by and between IEPA and EPA regarding the designation or proposed of Williamson County, IL under the 2010 SO₂ NAAQS.
- 4. All documents discussing the location or selection of modeling receptors around the Marion Generating Station for purposes of designating Williamson County, IL under the 2010 SO₂ NAAQS.
- 5. From September 2015 to present, all documents discussing any of the following regarding the Marion Power Station:
 - a. EPA site visits or actual observations of the property at or around the Marion Power Station
 - b. Public access to the Marion Power Station property, including property along or north of Lake Egypt Road

- c. All “available evidence” that the public had access to the Marion Power Station property, including property north of Lake Egypt Road, as referenced on pg. 23-24 of EPA’s Final Technical Support Document for Illinois
- 6. All documents discussing the use of AERMOIST in modeling for purposes of designating attainment, nonattainment, or unclassifiable under the 2010 SO₂ NAAQS.